

KML LAW GROUP, P.C.

A Professional Corporation incorporated in Pennsylvania
216 Haddon Avenue, Ste. 406
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Attorneys for CITBank, N.A., fka OneWest Bank, N.A., fka OneWest Bank, FSB

IN THE MATTER OF:

Christopher Bailey aka Chris Bailey

Judith A. Bailey

DEBTOR(S),

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 16-22255 VFP

**NOTICE OF MOTION FOR RELIEF
FROM STAY**

TO:

Christopher Bailey aka Chris Bailey
14 South Hall Court
Wayne, NJ 07470

Judith A. Bailey
14 South Hall Court
Wayne, NJ 07470

Christopher J. Balala
Scura, Wigfield, Heyer & Stevens, LLP
1599 Hamburg Turnpike
Wayne, NJ 07470

David L. Stevens
Scura, Wigfield, Heyer & Stevens, LLP
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Wayne, NJ 07470

Marie-Ann Greenberg
30 Two Bridges Road; Suite 330
Fairfield, NJ 07004

Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **CITBank, N.A., fka OneWest Bank, N.A., fka OneWest Bank, FSB**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **U. S. Courthouse, 50 Walnut Street; Newark, NJ**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors have failed to maintain their

monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested. The property involved is known as **14 South Hall Court, Wayne NJ 07470**. The hearing on this matter is scheduled for **November 16, 2017 at 11:00 AM.**

Dated: October 16, 2017

/s/Denise Carlon, Esq.

Brian C. Nicholas, Esquire
Denise Carlon, Esquire
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